

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE IOVANCE BIOTHERAPEUTICS,  
INC. STOCKHOLDER DERIVATIVE  
LITIGATION

Lead Case No. 1:17-cv-01806-LPS

(Consolidated with No. 1:18-cv-00469)

This Document Relates To:

ALL ACTIONS.

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL  
OF STOCKHOLDER DERIVATIVE SETTLEMENT**

PLEASE TAKE NOTICE that on July 2, 2020, plaintiffs Kevin Fong and Howard Rotto (together, "Plaintiffs") will move before the Honorable Leonard P. Stark, United States District Judge for the United States District Court for the District of Delaware, Courtroom 6124 of the J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, Delaware 19801, for entry of the [Proposed] Order and Final Judgment, and for such other relief as the Court deems appropriate (the "Motion").

In support of this motion, Plaintiffs rely upon the accompanying Memorandum of Points and Authorities in Support of Motion for Final Approval of Stockholder Derivative Settlement; the Declaration of Shane P. Sanders in Support of Plaintiffs' Motion for Final Approval of Stockholder Derivative Settlement, and the exhibits attached thereto; the Declaration of Philip Kim in Support of Plaintiffs' Motion for Final Approval of Stockholder Derivative Settlement; the Declaration of Timothy Brown in Support of Plaintiffs' Motion for Final Approval of Stockholder Derivative Settlement; the Declaration of Blake A. Bennett in Support of Plaintiffs' Motion for Final Approval of Stockholder Derivative Settlement; the Declaration of Brian E. Farnan in

Support of Plaintiffs' Motion for Final Approval of Stockholder Derivative Settlement; and all other evidence and argument that may be presented prior to the Court's decision on the Motion.

Dated: June 11, 2020

Respectfully submitted,

**COOCH AND TAYLOR, P.A.**

*/s/ Blake A. Bennett*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of June, 2020 a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Blake A. Bennett

Blake A. Bennett (#5133)